

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JAMES HAYDEN,

Plaintiff,

V.

2K GAMES, INC., et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

## EX. B TO TRIAL BRIEF—PLAINTIFF’S PROPOSED VOIR DIRE QUESTIONS

Plaintiff James Hayden (“Mr. Hayden”) submits the following Proposed Voir Dire Questions, pursuant to Judge Boyko’s standing Trial Order (¶ 1).

## Video Games

1. Do you play video games?
2. Does someone in your immediate family play video games?
  - a. If yes:
    - i. More than 10 hours per week?
    - ii. Do you have a video game console in your home?
3. Do you like video games?
  - a. Why/Why not?
4. What are your three favorite video games?
5. Have you played an NBA 2K game?
6. Have you watched someone else play an NBA 2K video game?
7. How would you describe the NBA 2K video game you played/watched?

8. Do you or your close friends or relatives work for a producer of video games or other multimedia products?

a. If yes:

i. What is the producer's name?

ii. What video games or other multimedia products does it produce?

**NBA Basketball**

1. Are you familiar with the NBA?

a. If yes:

i. What is your favorite team?

2. Have you heard of LeBron James?

a. If yes:

i. What do you think of him?

3. Have you heard of Tristan Thompson?

a. If yes:

i. What do you think of him?

4. Have you heard of Danny Green?

a. If yes:

i. What do you think of him?

5. Do you watch NBA basketball?

a. If yes:

i. How many games per year do you watch?

6. Do you play basketball?

a. If yes:

- i. In what context and how often?
- 7. Do you like the game of basketball?
- 8. Do you know the rules of basketball?

### **Tattoos**

- 1. Do you like tattoos?
  - a. Why/Why not?
- 2. Do you have any tattoos?
  - a. If yes:
    - i. Do you have more than three tattoos?
- 3. Have you ever created a tattoo?
- 4. Do you know any tattoo artists?
- 5. Have you ever watched someone get a tattoo?
- 6. Do you think tattoos are art?

### **Art**

- 1. Are you an artist?
- 2. Have you ever attended an art school?
- 3. Are any of your close friends or relatives artists?
- 4. Do you think artists have rights in the artwork they create?
- 5. Do you think artists should be able to protect their rights in the artwork they create?
- 6. Have you visited an art museum (like the Cleveland Museum of Art) within the past year?
- 7. Have you ever written something – an essay, article, book, etc. – that was published?

**Education**

1. Did you attend high school? Did you graduate from high school?
2. Did you attend college?
3. Did you graduate from college?
4. Did you attend a graduate or professional school? Do you hold any graduate degrees?

**Other**

1. Do you think American businesses are hurt by excessive litigation?